

Division Guidelines

ELECTRONIC KEY BOX

Note: Please adapt the below verbiage where necessary to match your specific system, job descriptions and your Internal Control Sections.

All restricted/sensitive keys, including those which access drop funds, are housed in an electronically controlled key box hereinafter referred to as the Key Box.

The Key Box is maintained and programmed by Security management (i.e., Security Manager and above) personnel and a member of Accounting management (i.e., Sr. Director of Finance, Controller) will monitor any programming changes for propriety. In the event Security management is not available to program the Key Box, programming will be performed by the Director of Security, Director of Property Management, Sr. Director of Finance or the Controller. Security management will add and remove keys from the key rings.

The Key Box is under dedicated surveillance coverage and shall not be recorded on a quad or multiplexer, but shall have its own video cassette recorder for recordation. Additionally, the surveillance coverage shall have the capability to identify every individual that accesses the Key Box. The Key Box is controlled by an electronic lock, a hand recognition system, a keypad and specific internal programming to prevent unauthorized access to sensitive keys. The Hand Recognition System provides a non-transferable means of identifying users and uses the uniqueness of three-dimensional hand geometry to control access to the box. The Key Box will be located outside of the slot office.

The Division will be notified of the following situations:

- In the event of system failure (i.e., hand geometry system, key box, etc.).
- Repairs that cannot be completed within twenty-four (24) hours.
- In the event the Key Box is inoperable.
- In the event the palm reader is inoperable for more than twenty-four (24) hours.
- Immediately when an alarm is reset.

In the event the Key Box or the palm reader is inoperable, manual key issuance procedures will be used. See below for manual key control procedures.

Each key is electronically locked in its location and within the confines of an electronically locked door. The door release lock and key release lock can only be accessed by persons authorized to check out specific key(s) and at specific times. An alarm is sounded for overdue keys, open door, invalid entry and invalid keys. Security management will reset the Key Box alarms. In case of mechanical or power failure, the Key Box is supplied by U.P.S. power that allows operation without AC power for approximately twenty four (24) hours and has a built in lithium battery to store memory for approximately seven (7) hours.

Override Procedures

For emergency access to the Key Box the following procedures are performed:

- Surveillance will be notified that emergency access is required.
- Security or Accounting management (i.e., Director of Security, Director of Property Management or Sr. Director of Finance) personnel will input their specific access code.

- A manual key log will be maintained documenting the date, time out/in, key number, reason for usage and signature and employee number of employees issuing, receiving, returning and accepting return of keys.
- The Key Box will be accessed using the access code.

In the event the palm reader should fail, keys will be issued directly from the key box. Each employee will input an access code and key requested into the keypad to access the approved key. The person authorizing the access to the key will also input a code into the keypad. This will allow access to the key requested.

In the event the software system should fail, daily reports will be run from the Key Box and not the software system. The printer is attached to the designated Key Box personal computer.

In the event of a complete power failure, Accounting management will access the key for the Key Box from the triple lock backup key box located in the Cage. Keys will be issued from the triple lock key box and logged on the manual logs currently in place.

Audit Trail Procedures

The Key Box is designed to provide an audit trail of all keys issued and subsequently returned to the Key Box.

All key movements are documented in real-time to a secured printer, which records the date, key number, key name, time out, time in and user name.

The daily transaction reports will be retrieved by accounting from the printer for review.

Reports are generated as keys are issued and returned to the Key Box. Income Audit will review the reports on a weekly basis for propriety of transactions. The List of Users report will be generated daily to reflect any additions to the Electronic Key Box System. The List of Users report will be compared to the previous day's report to reflect any additions to the Electronic Key Box System. Any discrepancies shall be investigated and documented. Documentation shall be retained for a minimum of five (5) years.

Programmed Access

Access to the Key Box will be programmed as "triple", "dual" or "single" access depending on the nature and sensitivity of the key.

Triple access is performed via the authorized users and the designated department utilizing a personal code and hand recognition, which is independent from the other.

Dual access is performed via the authorized user and the designated department utilizing a personal code and hand recognition, which is independent from the other.

Single access is performed via the authorized user utilizing their personal code and hand recognition.

NOTE: Any employee having access to the electronic Key Box shall be removed from having access to the electronic Key Box immediately upon job termination or upon changing positions to one that does not require having access to the electronic Key Box.

Key Control Procedures (Key Box)

If the Electronic Key Box is used, keys will be accessed based on the access level and authorized user described in the key control chart. Keys to perform the drop and count will be accessed only at the approved drop and count

time schedules. In the event of an emergency drop, keys may be accessed. The drop will be performed in accordance with the appropriate emergency drop article. (See emergency coin drop and/or emergency BVA drop Internal Control Sections).

Access to sensitive keys will be programmed in accordance with the following Key Control Chart:

Key Control Chart

Key Description

Access

Authorized User

(In this Section add all keys to be placed in the Electronic Key Box.)

Returning Keys to the Key Box

The same person(s) who checked out the keys will be required to return the keys. In the event the same person is not available to return a key, the designated person for returning must be of equal authority as the person who originally checked out the key. If a different employee logs in the key, surveillance shall be notified and surveillance shall monitor the entire log-in process including the return of the key to the key box. The videotape of the log-in process shall be retained for thirty (30) days.

Duplicate Keys

Duplicate restricted/sensitive keys will remain in the main vault under a triple access system.

All other duplicate keys will remain in the Security Manager's office under a dual access system.

Manual Key Control Procedures

Slot Keys

A key control log is maintained in the Casino/Slot Shift Manager's office for the issuance and return of slot machine keys to Slot Attendants, Supervisors and Managers, who access machines for jackpots, fills and short pays. Keys to each slot machine hopper will be maintained in a key box controlled by the Casino/Slot Shift Manager or Lead Technician. The log will contain the date, time in/out, key number(s), reason and printed name and signatures of employee issuing, receiving, returning and accepting return of keys.

Slot Drop Keys

The keys to the drop compartments will be located in a triple lock box at the Cage and will be accompanied by a minimum of two individuals at all times while signed out. A Cashier, Security Officer and Hard Count Lead must be present to access the triple lock key box. The Cashier maintains one key, the Security Officer signs a key out from Security Dispatch and the Hard Count Lead signs a key out from the Slot Department key box.

Keys to the Hard Count room, storage carts and unaudited funds rooms are maintained in a double lock key box at the Cage. One key is maintained by the Cashier, and the Security Officer signs out a second key from Security Dispatch. A Cashier, Security Officer and authorized individual from an independent department must be present to sign out keys from the double lock key box.

The immovable double and triple lock key boxes will be keyed in such a way as to allow the Cashier's key and Security's to access their respective locks in each box. The third lock on the triple lock key box requires a key from an authorized member of Hard Count or Soft Count or an authorized Slot representative for the purpose of repairs. The sensitive key log for the lock boxes requires individuals from three separate departments to be present when signing out keys. There shall be surveillance coverage monitoring the double and triple lock boxes at all times.

Manual Key Control Procedures (cont.)

The Hard Count room key, unaudited funds door and storage cart key are signed out by the Cashier, Security Officer and Count Room Lead and key log completed. The drop cabinet keys are signed out by the Cashier, Security Officer and Count Room Lead with Hard Count Team and sensitive key log completed when the drop is about to begin.

The keys to the unaudited funds door are returned to the double lock key box and the drop cabinet keys returned to the triple lock key box when the drop is complete and the key log is completed by the Cashier, Security Officer and Count Room Lead. The keys to the count room and storage cart are returned to the double lock key box and key log completed when the count is complete.

Emergency access to the drop compartment key is allowed for Slot Supervisors or Technicians for access to the compartment for maintenance reasons. The Security Officer will accompany the Slot Supervisor or Technician the entire time the key is signed out, until such time the key is returned to and secured in the triple lock key box at the Cage.

Currency Drop Keys

The BVA access key allows access to the BVA unit only and does not allow removal of the BVA drop box. The BVA access key is maintained and used by the Slot Department personnel for correcting jams and repairing the BVA unit.

The BVA release key is signed out by the Hard Count Lead, Cashier and Security Officer. The BVA contents key is used only by Soft Count personnel and is maintained in the triple lock key box at the Cage. If one key allows access to the BVA unit and also allows removal of the drop box the key is signed out by the Security Officer, Cashier and Hard Count Lead. This key may be signed out by a Slot Technician for BVA maintenance. Surveillance must be notified of the key's use, and a Security Officer must accompany the key and observe the repair of the unit by the Slot Technician.

Keys to the Soft Count room door, storage room and storage carts are locked in the double lock key box maintained by the Cage. One key is maintained by the Cashier and the Security Officer signs out a second key from Security Dispatch. A Cashier, Security Officer and authorized individual from an independent department must be present to sign out the keys from the double lock key box.

The Cashier with Security Officer and Count Room Lead unlock the double lock key box to obtain the storage room key and storage cart keys and complete the key log. The BVA release keys are obtained from the double lock key box by the Cashier with Security Officer, Count Room Lead and Hard Count Team and the key log is completed.

The BVA release keys, storage room key and storage cart keys are returned to the double lock key box when the

drop is complete and the key log completed by the Cashier, Count Room Lead and Security Officer.

The soft count room key and the storage cart key are obtained from the double lock key box and the contents key is obtained from the triple lock key box by the Cashier, Count Room Lead, Security Officer with Count Team and key log completed.

Manual Key Control Procedures (cont.)

The soft count room key, storage cart keys are returned to the double lock key box and the BVA contents key returned to the triple lock key box when the count is complete and key log completed by the Count Room Lead, Security Officer and Cashier.

Table Drop Keys

Keys to the Soft Count room door, storage carts and storage room are locked in a double lock key box maintained by the Casino Cage. One key is maintained by the Cashier and the Security Officer signs out a second key from Security Dispatch. A Cashier, Security Officer and authorized individual from an independent department must be present to sign out the keys from the double lock key box.

Drop box contents keys are locked in a triple lock key box maintained by the Casino Cage. A Cashier, Security Officer and Soft Count Lead must be present to access the triple lock key box. The Cashier maintains one key, the Security Officer signs a key out from Security Dispatch and the Soft Count Lead signs a key out from the Slot Department key box.

The Cashier with Security Officer and Casino Supervisor unlocks the double lock key box to obtain the storage room and storage cart keys and completes key log. The double lock key box is also accessed to return the storage cart key and obtain the release keys and the key log is completed.

The release keys and storage room key is returned to the double lock key box when the drop is complete and key log completed by the Cashier, Security Officer and Casino Supervisor.

The Cashier with Soft Count Lead, Security Officer and Count Team unlocks the double lock key box to obtain the soft count room key and storage cart key and completes key log. The triple lock key box is accessed to obtain the contents keys and completes key log.

The soft count room key and storage cart key is returned to the double lock key box and the contents keys returned to the triple lock key box and the key logs are completed by the Cashier, Security Officer and Soft Count Lead.

Card and Dice Keys

The cards and dice will be stored in the terminal facilities in a secured area with dual key control maintenance by Security and Casino personnel. The key to the Card and Dice Storage locker will be maintained by the Casino Shift Manager.